

1 **LENARD E. SCHWARTZER**  
2850 S. Jones Blvd., Ste 1  
2 Las Vegas, NV 89146  
(702) 307-2022

3 TRUSTEE  
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8 **UNITED STATES BANKRUPTCY COURT**  
9 **DISTRICT OF NEVADA**

10 In re ) Case No. BK-S S 19-11372-BTB  
11 JOEL CROSBY SINNOTT, ) IN PROCEEDINGS UNDER CHAPTER 7  
12 ) TRUSTEE'S EX PARTE APPLICATION TO  
13 ) EMPLOY DEBORAH L. PRIEBE, REAL  
14 ) ESTATE AGENT, ON A COMMISSION  
Debtor ) BASIS  
15 )  
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16 The ex parte application of Trustee represents:

17 1. The Debtor filed for relief under Chapter 7 of the United States Bankruptcy Code  
18 on March 12, 2019, and LENARD E. SCHWARTZER is the duly appointed and acting trustee  
19 herein.

20 2. The Debtor's assets include property situated in Clark County, Nevada (the  
21 "Property") described as:

22 8720 Castle View Ave Las Vegas, Nv 89129

23 3. According to the schedules, the property is "upside down," and, in all likelihood,  
24 will be sold as a "short sale."

25 4. Trustee wishes to employ a real estate agent to sell the Property.

26 5. Trustee has selected DEBORAH L. PRIEBE, a licensed real estate agent  
27 ("Realtor"), Senior Vice President of Short Sale Success, 170 South Green Valley Parkway, Suite  
28 200, Henderson, Nevada 89012, and associated with Elegant Properties LLC, 170 South Green

1 Valley Parkway, Suite 200, Henderson, Nevada 89012, a licensed real estate brokerage firm.  
2 Realtor has had considerable experience selling real estate of this type.

3 6. Trustee desires to retain Realtor under an exclusive right to sell and pay a  
4 commission upon the closing of the sale of the property. Any sale will be subject to the prior  
5 approval of this Court.

6 7. The Trustee is of the opinion that it would be in the best interests of the estate for  
7 your Applicant to retain Realtor as a real estate agent. The Trustee will only present a sale where  
8 there are material net proceeds for the Bankruptcy Estate.

9 8. To the best of Applicant's knowledge, neither Realtor nor any employee or officer  
10 of Short Sale Success or Elegant Properties LLC, represent an interest adverse to the Debtor,  
11 creditors, any other party in interest, their respective attorneys and accountants, the United States  
12 Trustee, or any person employed in the Office of the United States Trustee.

13 9. Realtor is aware that dual representation of the Chapter 7 Trustee/Bankruptcy  
14 Estate and buyer is prohibited

15 10. Realtor will charge a 6% commission based on the sales price, subject to review  
16 under 11 USC § 330 of the Bankruptcy Code and Court approval.

17 11. Applicant routinely employs DEBORAH L. PRIEBE as a realtor in other  
18 unrelated cases.

19 Wherefore, Trustee prays for an order authorizing the employment of Realtor to sell the  
20 above-described property on the terms stated herein.

21  
22 Dated: July 3, 2019

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25 LENARD E. SCHWARTZER  
26 Trustee  
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**DECLARATION OF TRUSTEE**

I declare, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge, information and belief.

DATED: July 3, 2019

  
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LENARD E. SCHWARTZER